

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

256 FIFTH AVENUE, 2ND FLOOR

NEW YORK, NEW YORK 10001

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ZACH INTRATER
OF COUNSEL

ANDREA L. ZELLAN

JACOB KAPLAN

TENY R. GERAGOS
ADMITTED IN NY & CA

STUART GOLD

March 19, 2021

VIA ECF

Honorable Kimba M. Wood
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Goldstein, 18 CR 217 (KMW)

Dear Judge Wood:

As part of the bail conditions in the above-referenced case, Jeff Goldstein's travel was limited to the Southern and Eastern Districts of New York (without limitation), the District of New Jersey (for counsel visits and employment) and the District of Connecticut (for employment). Goldstein is currently on call as a Red Cross volunteer to be deployed to Texas to help support a shelter dormitory planned for 750 unaccompanied migrant children at the border. We therefore request a modification of Goldstein's travel restrictions to allow Goldstein to travel with the Red Cross to Texas for a 14-day period. Goldstein will provide his itinerary to Pretrial Services in advance of his trip.

We have spoken with the Government and Pretrial Services, and both have no objection to our request. Thank you for your consideration.

Respectfully submitted,

Jacob Kaplan

Jacob Kaplan

cc: Government Counsel (via ECF)
Pretrial Services Officer Andrew Abbott (via email)